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November 15, 2021

BY ECF

Hon. Alvin K. Hellerstein United States District Judge Southern District of New York 40 Foley Square New York, New York 10007 I approve the proposal. Defendant shall file an updated bond with the Court. So ordered.

/s/ Alvin K. Hellerstein November 16, 2021

Re: United States v. Luka Klasinc, 21-CR-443 (AKH) (S.D.N.Y.)

Dear Judge Hellerstein:

I am writing on behalf of defendant Luka Klasinc and in a follow-up to the November 10, 2021 bail hearing held before Your Honor.

While we were aware that the property Robert Knox agreed to post to secure Mr. Klasine's bond was purchased by Mr. Knox for his daughter Grace in 2021, we were only recently made aware that the property itself is also entirely in Grace's name, as opposed to Robert's. As such, in speaking with the government, we now understand with this development that Grace will have to be sworn to the bond as she is the outright owner of the property.

Given that the Court had previously wanted assurances from Mr. Knox concerning the significance and consequences of posting the property, I have also attached to this letter an affidavit from Grace Knox in which she confirms that she is well-aware of the conditions being placed on Mr. Klasinc should he be released as well as her obligations to automatically forfeit her property should any of those conditions be violated. *See* November 15, 2021, Affidavit of Grace Knox, attached as Exhibit A.

## JEFFREY LICHTMAN

Hon. Alvin K. Hellerstein United States District Judge November 15, 2021 Page 2

Should the Court be satisfied with Grace Knox posting the property to secure Mr. Klasinc's bond, I will file with the Court a revised bond to be approved and to be sent to the clerk's office for execution.

Respectfully submitted,

Jeffrey Lichtman

cc: All counsel (by ECF & email)

## **EXHIBIT A**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
X

UNITED STATES OF AMERICA.

Docket No. 21 CR 443 (AKH) (SDNY)

**AFFIDAVIT** 

LUKA KLASINC, et al.

Defendant.

GRACE KNOX, being duly sworn, deposes and says:

- 1. My name is Grace Knox. I am 22 years old and reside in Illinois.
- 2. Recently, I came to understand that Luka Klasinc, a very close family friend, was being charged with federal crimes in the Southern District of New York, and was being detained while he awaited trial.
- J have also come to understand that he may be released on a bond of \$1 million from pretrial detention if he satisfied certain conditions. One condition is that Luka remain in the Southern District of New York under twenty-four hour home confinement at a self-funded apartment, and that he attend all of his court dates. Another condition is that he does not have any contact with any known victims or witnesses, that he does not use the internet, that he have no involvement with "BOB77, LLC" business or contact with any of its employees, that he surrender all passports and travel documents with no renewals, and that he does not use a cell phone.
  - 4. I am fully confident that Luka will not violate any of these conditions, and as such,

I am volunteering to put up as security for his release my house, located at 503 | Wave Ave . This property, which is my only residence, was purchased in Sarrington IL 6000 2021 for \$576,000, and has since been renovated with approximately \$60,000 in upgrades.

I am completely aware that should Luka violate any of the above-described conditions, my property will be automatically relinquished to the United States government.

Sworn to before me this

Zday of November, 2021

THOMAS SCHAEFER WATERY FUBLIC STATE OF WAR MY COMMISSION EXPIRES 07 (2024)